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E-filed: May 10, 2010

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15 Attorneys for Reorganized Debtors

16 **UNITED STATES BANKRUPTCY COURT**
 17 **DISTRICT OF NEVADA**

18 In re:

19 THE RHODES COMPANIES, LLC, aka
 20 "Rhodes Homes," et al.¹

21 Debtors.

22 Case No.: BK-S-09-14814-LBR
 23 (Jointly Administered)

24 Chapter 11

25 Affects:



28 Hearing Date: May 11, 2010

Hearing Time: 1:30 p.m.

Courtroom 1

1 The Debtors in these cases, along with their case numbers are: Heritage Land Company, LLC (Case No. 09-14778); The Rhodes Companies, LLC (Case No. 09-14814); Tribes Holdings, LLC (Case No. 09-14817); Apache Framing, LLC (Case No. 09-14818); Geronimo Plumbing LLC (Case No. 09-14820); Gung-Ho Concrete LLC (Case No. 09-14822); Bravo, Inc. (Case No. 09-14825); Elkhorn Partners, A Nevada Limited Partnership (Case No. 09-14828); Six Feathers Holdings, LLC (Case No. 09-14833); Elkhorn Investments, Inc. (Case No. 09-14837); Jarupa, LLC (Case No. 09-14839); Rhodes Realty, Inc. (Case No. 09-14841); C & J Holdings, Inc. (Case No. 09-14843); Rhodes Ranch General Partnership (Case No. 09-14844); Rhodes Design and Development Corporation (Case No. 09-14846); Parcel 20, LLC (Case No. 09-14848); Tuscany Acquisitions IV, LLC (Case No. 09-14849); Tuscany Acquisitions III, LLC (Case No. 09-14850); Tuscany Acquisitions II, LLC (Case No. 09-14852); Tuscany Acquisitions, LLC (Case No. 09-14853); Rhodes Ranch Golf and Country Club, LLC (Case No. 09-14854); Overflow, LP (Case No. 09-14856); Wallboard, LP (Case No. 09-14858); Jackknife, LP (Case No. 09-14860); Batcave, LP (Case No. 09-14861); Chalkline, LP (Case No. 09-14862); Glynda, LP (Case No. 09-14865); Tick, LP (Case No. 09-14866); Rhodes Arizona Properties, LLC (Case No. 09-14868); Rhodes Homes Arizona, L.L.C. (Case No. 09-14882); Tuscany Golf Country Club, LLC (Case No. 09-14884); and Pinnacle Grading, LLC (Case No. 09-14887).

1 APACHE FRAMING, LLC
 2 BATCAVE, LP
 3 BRAVO, INC.
 4 CHALKLINE, LP
 5 ELKHORN PARTNERS, A NEVADA LP
 6 GERONIMO PLUMBING LLC
 7 GLYNDA, LP
 8 GUNG-HO CONCRETE LLC
 9 HERITAGE LAND COMPANY, LLC
 10 JACKKNIFE, LP
 11 OVERFLOW, LP
 12 PARCEL 20, LLC
 13 PINNACLE GRADING, LLC
 14 RHODES HOMES ARIZONA, LLC
 15 RHODES ARIZONA PROPERTIES, LLC
 16 THE RHODES COMPANIES, LLC
 17 RHODES RANCH GOLF COUNTRY CLUB,
 18 LLC
 19 RHODES RANCH GENERAL
 20 PARTNERSHIP
 21 SIX FEATHERS HOLDINGS, LLC
 22 TRIBES HOLDINGS, LLC
 23 TICK, LP
 24 TRIBES HOLDINGS, LLC
 25 TUSCANY GOLF COUNTRY CLUB, LLC
 26 WALLBOARD, LP

27 **STIPULATION BETWEEN INTERNAL REVENUE SERVICE AND DEBTORS RE**
 28 **DEBTORS' OMNIBUS OBJECTION TO INTERNAL REVENUE SERVICE CLAIMS**
 29 **PURSUANT TO SECTION 502(b) OF THE BANKRUPTCY CODE, BANKRUPTCY**
 30 **RULES 3003 AND 3007 [DOCKET NO. 357]**

31 Regarding the *Debtors' Objection to Internal Revenue Service Claims Pursuant to*
 32 *Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007* (the "Objection"), filed
 33 by The Rhodes Companies, LLC and its affiliated debtors (collectively, the "Debtors"), the
 34 Reorganized Debtors and the Internal Revenue Service ("IRS") hereby stipulate and agree as
 35 follows:

36 1. All of the claims that were the subject of the Objection have been resolved by
 37 virtue of the fact that the IRS has amended all of the claims that were the
 38 subject of the Objection.
 39 2. The Parties both agree that the Objection is now moot and shall request at the

1 hearing on May 11, 2010 that the Court move the Objection off calendar.
2

3 Dated: May 10, 2010
4

5 By
6

7 */s/ Virginia Lowe, Esq.*
8

9 Virginia Cronan Lowe, Esq.
10 Trial Attorney, Tax Division
11 U.S. Department of Justice
12

13 Dated: May 10, 2010
14

15 By
16

17 */s/ Shirley S. Cho*
18

19 Shirley S. Cho, Esq.
20 Co-Counsel for the Reorganized Debtors
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